

# **EXHIBIT 7**

## Susan Bogart

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**From:** Steven.Jedlinski@hklaw.com  
**Sent:** Monday, December 10, 2018 8:16 PM  
**To:** sbogart@susanbogart.com; eccohen@brinksgilson.com  
**Cc:** Shannon.Armstrong@hklaw.com; Client\_Team-CLEAResult/NEXT@hklaw.com  
**Subject:** CR/NEXT: expert cost proposal

Susan and Eric,

As discussed, we provide CLEAResult's proposal regarding reasonable costs related to NEXT's expert depositions. As you know, a party seeking to recoup the expert's costs must demonstrate that the amount of time spent in preparing for the deposition was reasonable. See *Gwin v. American River Transp. Co.*, 482 F.3d 969, 975 (7th Cir. 2007)

### ***Valerdi Reasonable Fee Proposal***

- Preparation time without attorneys (5 hours at \$400) - \$2,000
  - Tr. 74:22-75:7
  - *Waters v. City of Chicago*, 526 F. Supp. 2d 899, 901 (excluding from reimbursement expert's time spent in conversation with retaining party's counsel before deposition).
- Deposition Time - \$2,800
- Expenses - \$1,034
- Total - \$5,834

### ***Snell Reasonable Fee Proposal***

- Based on his deposition testimony, Mr. Snell did not keep track of the hours spent preparing for his deposition (Tr. 38:7-18). In addition, his deposition preparation time (33 hours) is unreasonable in comparison to his deposition time (6.25 hours). Finally, he simply repeats the same block billing entry over and over.
- Deposition Time - \$3,125
- Errata Sheet - \$500
  - His time spent preparing the errata sheet (5 hours) almost equates to the time spent in his entire deposition and therefore is unreasonable.
- Total - \$3,625

After you have had a chance to consider this proposal, CLEAResult is willing to further discuss any remaining disputes.

Regards,  
Steve

**Steven Jedlinski | Holland & Knight**

Partner

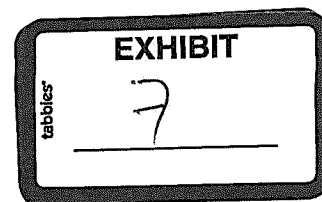
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